

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

Karla M. Vasquez, individually and as
Parent, Next Friend, Natural and General
Guardian of Aaron Vasquez,

Plaintiff,

vs.

Pickens County; Pickens County Sheriff's
Department; Rick Clark, Pickens County
Sheriff; James William Trotter, Matt
McGaha; Chief Deputy Chuck James; and,
Lieutenant Tommy Blankenship,

Defendants.

CASE NO.: 8:22-cv-02641-DCC-KFM

**NOTICE OF DESIGNATION OF
EXPERT WITNESS**

The Defendants, Pickens County; Pickens County Sheriff's Department; Rick Clark, Pickens County Sheriff; Matt McGaha; Chief Deputy Chuck James; and Lieutenant Tommy Blankenship, hereby submit this Designation of Expert:

These Defendants expect to potentially call the following individual as an expert witness at the trial of this action:

- A. Richard G. Merkler, M.D., F.A.A.P.
315 West 57th Street, Suite 301
New York, NY 10019
Phone: (212) 838-4715
Email: RichardMerkler@gmail.com

Dr. Merkler is expected to give expert opinion testimony regarding his review of any and all of the investigative reports, depositions, discovery documents, medical records, testing, photographs, lab results, and any documentation involved in the reporting of the subject incident as well as any other investigative, medical, scientific materials or any materials provided through the course of discovery relating to the

circumstances of how this incident occurred and to the Plaintiff's complaints and alleged damages.

Dr. Merkler will give expert opinion testimony with regard to his particular areas of expertise in the fields of pediatric special needs and autism, on the issues of causation of the complaints of the Plaintiff, and any other relevant analysis or expert opinions that he may have regarding the Plaintiff's complaints and damages.

s/Patrick L. "Trey" Still, III

Patrick L. "Trey" Still, III (Bar No.: 9857)

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July 17, 2023

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of Defendants Pickens County; Pickens County Sheriff's Department; Rick Clark, Pickens County Sheriff; Matt McGaha; Chief Deputy Chuck James; and Lieutenant Tommy Blankenship's Notice of Designation of Expert, Report of Dr. Richard Merkler, CV of Dr. Richard Merkler, and Index of Records from Dr. Richard Merkler were served upon the following parties on the 17th day of July, 2023, via:

	United States Postal Service
	Facsimile
X	Electronic Email
	Via Hand Delivery

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s/Patrick L. "Trey" Still, III

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